

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SCARLETT PAVLOVICH,

Plaintiff,

-against-

AMANDA PALMER,

Defendant.

C.A. NO. 1:25-CV-00969

**UNOPPOSED MOTION TO DISMISS
WITHOUT PREJUDICE PURSUANT
TO RULE 41(a)(2)**

**UNOPPOSED MOTION TO DISMISS WITHOUT PREJUDICE PURSUANT TO RULE
41(a)(2)**

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiff hereby submits this Unopposed Motion to Dismiss Without Prejudice.

When Plaintiff brought this action, it was unclear where personal jurisdiction could be obtained over Defendant and a third-party. Plaintiff filed claims against Defendant and the third-party in the Western District of Wisconsin, because the Western District of Wisconsin is the forum in which the third-party claims he resides. Plaintiff also brought her claims against Defendant in the Southern District of New York (because Defendant formerly resided in New York) and the District of Massachusetts (because Defendant had recently reportedly relocated there) to preserve her rights. Plaintiff served Defendant in the District of Massachusetts and Defendant has acknowledged that the District of Massachusetts has personal jurisdiction over her. Plaintiff has agreed to proceed against Defendant in the District of Massachusetts and will not re-file this action elsewhere.

Plaintiff respectfully requests that the attached stipulation dismissing the instant action without prejudice be So Ordered by the Court.

Dated: May 29, 2025

Respectfully Submitted,

By: /s/ Akira M. Cohen

Akiva M. Cohen (AC2400)

Thomas Neville (pro hac vice pending)

Dylan Schmeyer (pro hac vice pending)

KAMERMAN UNCYK SONIKER &

KLEIN P.C.

1700 Broadway

New York, New York 10019

Tel: (212) 400-4930

tneville@kusklaw.com

dschmeyer@kusklaw.com

acohen@kusklaw.com

Attorneys for Plaintiff